(1) Marcia B - FYI
(2) G. Hofer

1b

no date

This Action is EPA's total responsibility 9/20/85

Dangerous Waste
Facility Management Plan
Pacific Wood Treating
Ridgefield Brick and Tile Site
WAD 009036906

I. Background

The Pacific Wood Treating, Ridgefield Brick and Tile (PWT/RBT) facility consists of an inoperative 176 foot by 169 foot lined, capped, and monitored dangerous waste (DW) landfill which was closed under the close supervision of the Washington State Department of Ecology (WDOE) and the U.S. Environmental Protection Agency (EPA) via such mechanisms as WDOE Order No. DE 83-468 (dated October 26, 1983) and Notice of Penalty No. DE 83-284 (dated June 20, 1983). The buried dangerous waste consists of 190 to 240 tons of ash mixed with approximately ninety-five percent woodyard waste. The dangerous waste ash consists of furnace bottoms and multi-cone and bag house waste from the waste wood boiler plant which were contaminated with bottom sludges from the treatment of wastewaters from wood preserving processes that used creosote and pentachlorophenol (K001). In addition, treated wood was burned and system upsets shunted pentachlorophenol and creosote wastes to the waste wood boiler plant. The ash only exhibited EP toxicity for arsenic (D004). The waste is a RCRA and State dangerous waste. The PWT/RBT facility was last inspected on April 25, 1985 and a compliance letter dated May 30, 1985 concluded that the facility appeared to have been conscientiously closed per the aforementioned closure agreements and that post-closure commitments are being met with the exception that post-closure insurance must be obtained and its obtainment documented to the WDOE per 40 CFR 265.145 by September 1, 1985. The EPA conducted an oversight inspection, but no review comments have been received. Despite the fact that the facility was closed per the aforementioned procedure, the EPA requested a Part B permit application as regards closure and post-closure requirements be submitted in October 1985. (A WDOE request for submittal ensued.)

The dangerous waste was placed in the facility from sometime in 1979 to January 24, 1983. The site was closed on October 17, 1983. Since some wastes were placed in the facility prior to the effective date of RCRA (November 19, 1980), the potential for superfund or CERCLA activity exists. But although rather small in size, the company has been very cooperative in regards to closure activities in the past. However, to my knowledge, they have not yet made any effort to comply with the Part B requirements.

not relevant
3004(u)
3008(h)

The facility routinely monitors nearby drinking water wells, three on-site lysimeters, and the landfill toe drain. Due to the aforementioned closure and post-closure agreements which were complied with and the facility's minor environment significance, I have determined that the groundwater monitoring system is adequate with the exception that the underdrain's leachate lines' discharge should be routinely measured in place of one of the two toe drain samples. However, in an in house memorandum dated October 31, 1984, Michael Brown of EPA stated that the groundwater monitoring system was not adequate. Thus, the November 8, 1985 certification of compliance with 40 CFR 264, Subpart F, groundwater requirements is unresolved at this time.

II. Environmental Significance

The health risk from, and the environmental significance of, the PWT/RBT facility is extremely small due to the following reasons. The public perception or concern regarding this site is very minimal. The waste is contained in a well designed landfill. Water quality samples collected from nearby drinking water wells, lysimeters, and the toe drain indicate that the WDOE DE 83-468 stipulated concentration of arsenic (one-half the drinking water standard), and pentachlorophenol and napthalene (one-half the acute fresh water aquatic life toxicity criteria) are consistently being met. The major parameters of concern per the WDOE DE 83-468 order are often at less than detectable levels. Per 40 CFR 265.93-Statistical Methods, there was no significant increase of downgradient water quality parameters over background values. Finally, only one fraction of the bag house ash was a dangerous waste (due to its EP toxicity for arsenic) and approximately 95% of the landfilled waste is wood waste. Hence, the waste's hazard is relatively minimal. The toe drains' and the underdrains' sumps are dry about six months per year. The underdrain system usually produces less than 10 gallons in 24 hours during the remainder of the year. The flow from the toe drain has not been representative in the past due to a crack which developed in the cover that has since been sealed. Any flow which exceeds the toe drain sump's capacity is discharged to the ground and then flows to a nearby ditch. The EPA has expressed concern about this overflow (Michael Brown, October 31, 1984 in house memorandum). The company has been asked to more accurately measure and document discharge flows during their routine facility inspections in the future.

III. Schedule

To be completed by Frank Monahan

IV. Comments and Concerns

This facility warrants minimal involvement on the part of the WDOE.

JC:sk(6/5)